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To meltzer@organixinc.com

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bcc

Subject John J Riley Site

John J Riley Site (Woburn, MA)

Peter - Here are our comments on the
Scope of Work Deliverable
Organix LLC (former John J Riley Site)
dated April 25, 2006

Overall, this Scope of Work Deliverable appears to adequately address the intent of EPA's time critical removal action, namely eliminating the direct contact threat posed by the contaminated surface soils and preventing downstream migration of the contamination. As you know this project represents a first step in the Massachusetts Contingency Plan 21E process, which will ultimately require the delineation of the full lateral and vertical extent of contamination and implementing a risk-based site cleanup/management program. If you prefer, you may opt to submit the final version of this deliverable as a Release Abatement Measure Plan, in order to more clearly delineate how this immediate cleanup effort fits into the 21E program.

Sampling to determine the speciation of chromium (i.e. trivalent vs. hexavalent) should be conducted at the beginning of the project so that the potential risks to both cleanup workers and the public can be properly identified and addressed.

The implementation schedule should include a timeline beginning with EPA approval and showing various milestones such as start of work, sampling, site preparation, earthwork, waste disposal, and site restoration. As certain components of the project may not be determined until work is underway, this timeline should identify major assumptions and contingencies.

Portions of the Site are heavily vegetated and poison ivy is present. Therefore, EPA recommends that you health and safety plan address biological hazards such as ticks and poison ivy.

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